

Matthew G. McHenry, OSB 043571
Levine & McHenry LLC
1050 SW Sixth Avenue, Suite 1414
Portland, Oregon 97204
503-546-3927
email: matthew@levinemhenry.com

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA, } No. 3:22-cr-00084-SI
Plaintiff, } UNOPPOSED MOTION TO EXTEND
vs. } DEADLINE TO FILE PRETRIAL
TONY KLEIN } DOCUMENTS
Defendant. }

Defendant Tony Klein, through his attorney Matthew G. McHenry, moves to extend the deadline for filing pretrial documents and motions in limine to April 21, 2023, and to adjust reply and response deadlines accordingly. The government does not object to this motion.

Pretrial documents are currently due April 12, 2023. Defense investigation is ongoing, as is discovery production and production of *Brady* materials by the government. The 9-day extension is requested to ensure that parties have all available and up-to-date documents and information that are pertinent to the pretrial filings.

The parties are not requesting an extension on the due date for the proposed jury questionnaire, and intend to submit that to the Court by April 12, 2023, as previously ordered.

Respectfully Submitted this 6th day of April, 2023:

/s/ Matthew G. McHenry
Matthew G. McHenry
Counsel for Tony Klein